

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re

Chapter 11

ICON REALTY CORP.

Case no. 09-14485

Debtor.
-----X

NOTICE OF HEARING

PLEASE TAKE NOTICE, that the hearing will be held before the Honorable Allan L. Gropper at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408, on the 4th day of March, 2010 at 10:00 a.m. to consider the annexed application of Icon Realty Corp. to expunge claim 6 filed by the United States Internal Revenue Service pursuant to section 502 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE, that objections, if any, shall be in writing, served upon the undersigned, and filed with the Clerk of Court, with a courtesy copy to Judge Gropper's chambers, at least three days prior to the hearing date.

Dated: New York, New York
January 27, 2010

BACKENROTH FRANKEL & KRINSKY, LLP
Attorneys for the Debtor

By: /s/ Mark Frankel
489 Fifth Avenue
New York, New York 10017
(212) 593-1100

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OBJECTION TO CLAIM NUMBER 6 OF THE INTERNAL REVENUE SERVICE

Icon Realty Corp. (the "Debtor"), by its attorneys Backenroth Frankel & Krinsky, LLP, as and for its application pursuant to section 502 of the Bankruptcy Code for an order expunging claim 6 asserted against the Debtor by United States Internal Revenue Service, respectfully represents as follows:

1. On July 15, 2009 (the "Petition Date"), the Debtor filed a petition under Chapter 11 of the Bankruptcy Code. No trustee, examiner or committee has been appointed in this Chapter 11 case.
2. By this application, the Debtor seeks to expunge Claim 6 in the amount of \$5,707 against the Debtor's estate asserted by the Internal Revenue Service.
3. Upon information and belief, Claim 16 consists of amounts allegedly due based upon estimates made by the Internal Revenue Service.

4. The Debtor's books and records reflect all such taxes paid in full, that the estimated amounts are not due and owing, and that claim number 6 should therefore be expunged.

WHEREFORE, the Debtor respectfully requests that the Court enter an order expunging claim 6, and that the Court grant such other and further relief as is just and proper.

Dated: New York, New York
January 14, 2010

BACKENROTH FRANKEL & KRINSKY, LLP
Attorneys for the Debtor

By: s/Mark Frankel
489 Fifth Avenue
New York, New York 10017
(212) 593-1100

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STATE OF NEW YORK)
) s.s.:
COUNTY OF NEW YORK)

Vasilios Roufanis, being duly affirmed, deposes and says:

1. I am the president of Icon Realty Corp. (the "Debtor"), and I am making this affidavit in support of the attached objection to the claims filed in this case by the United States Internal Revenue Service.

2. I have read the objection and the facts therein are true and correct to the best of my knowledge information and belief.

s/Vasilios Roufanis

Sworn to before me
this 15th Day of January, 2010

s/Mark Frankel
Notary Public